

**BOBBY JINDAL**  
GOVERNOR



**HAROLD LEGGETT, PH.D.**  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20080001  
Agency Interest No. 1138

Mr. John V. Casey  
Plant Manager  
PO Box 228  
Geismar, LA 70734-0228

RE: Part 70 Operating Permit Renewal, Westlake Vinyls Co, LP  
Westlake Vinyls Co LP, Geismar, Ascension Parish, Louisiana

Dear Mr. Casey:

This is to inform you that the permit renewal for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_ of \_\_\_\_\_, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Permit No.: 2843-V1

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary  
CSN:ALR  
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**EDC Marine Loading Operations**  
**Agency Interest No.: 1138**  
**Westlake Vinyls Co, LP**  
**Geismar, Ascension Parish, Louisiana**

**I. Background**

Westlake Vinyls Company, LP (WVC) owns and operates a chemical manufacturing facility in Geismar, Louisiana. The WVC complex has plants that produce ethylene dichloride (EDC), vinyl chloride monomer (VCM), and polyvinyl chloride (PVC). The Westlake Vinyls Co, LP – EDC Marine Loading Operations currently operates under Permit No. 2843-V0, issued August 6, 2003.

This is the Part 70 operating permit for the facility.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by Westlake Vinyls Co, LP on December 19, 2007 requesting a Part 70 operating permit renewal. Additional information was submitted on May 19, 2008.

**III. Description**

1,2-Dichloroethane or Ethylene dichloride (EDC) is manufactured in the VCM-E/EDC production unit. Purified anhydrous EDC is either further processed to manufacture vinyl chloride or stored as a product for sale. The EDC to be used for product is purified and transferred to storage. The stored EDC product is transferred via aboveground pipeline to loading operations for shipments in barges. Vapors displaced from barge filling are rerouted back to the EDC storage tank. System operational pressure is maintained on the storage tank via an electrical compressor. Any excess pressure generated by the marine loading operations is vapor balanced back to the EDC product storage tank where any excess pressure vents to the vent incineration system located in the VCM-E Plant (permitted under Permit No. 1248-V2) for further regulatory required control. Vents are routed to the Primary Vent Incinerator located in the VCM-E Plant. As necessary, a Secondary Vent Incinerator is available for vent control. Vent control operational and regulatory requirements for this marine loading system have been addressed in the Title V permit application for the VCM-E Plant (Primary and Secondary Incinerator). Barge loading operations will be identified as a source of vents to these units.

This permit is a renewal of a Part 70 Operating permit and includes a reconciliation to the Fugitive emissions based on an updated component count with a 20% contingency factor.

Estimated emissions in tons per year are as follows:

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<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	-	-	-
SO <sub>2</sub>	-	-	-
NO <sub>x</sub>	-	-	-
CO	-	-	-
VOC *	0.11	0.10	-0.01

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,2-Dichloroethane	0.11	0.10	-0.01
Total			

#### IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

#### V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

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**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Emissions were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. The proposed project did not require the applicant to model emissions.

**VIII. General Condition XVII Activities**

Work Activity	Schedule	Emission Rates - tons				
		PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Sampling Procedures	90 samples/month	-	-	-	-	<0.001
Pump Preparation	6 pumps/year	-	-	-	-	0.002
Line Preparation	10 sections/year	-	-	-	-	0.005
Instrumentation	12 instruments/year	-	-	-	-	<0.001
Mechanical Work						

**IX. Insignificant Activities**

ID No.:	Description	Citation
-	Knockout Tank	LAC 33:III.501.B.5.A.2
-	Drum Cleaning	LAC 33:III.501.B.5.A.7

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X.	Table 1. Applicable Louisiana and Federal Air Quality Requirements																
	ID No.:	Description	LAC 33:III. Chapter														
5 <sup>▲</sup>			9	2103	2107	2108	2111	2113	2121	2122	29*	51*	56	59*			
UNF0003	Facility Wide	1	1		2	2	2	1						1	1	1	1
EQT0009	03-01 - Product Storage Tank**			1												1	
FUG0001	03-02 - Fugitive Emissions										2	2				1	

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

\*\*Emissions from EQT0009 - 03-01 - Product Storage Tank are vented to EIQ source No. 74-6 (Permit No. 1248-V2) in VCM-E Plant. There are no emissions at this location

**KEY TO MATRIX**

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS		40 CFR 61		40 CFR 63 NESHAP			40 CFR					
		A	Kb	VV	A	F	V	A	F	G	H	Y	64	68
UNF0003	Facility Wide								1	1				1
EQT0009	03-01 - Product Storage**		2						1		1			2
FUG0001	03-02 - Fugitive Emissions			2					2	1			1	

\*\*Emissions from EQT0009 - 03-01 - Product Storage Tank are vented to EIQ source No. 74-6 (Permit No. 1248-V2) in VCM-E Plant. There are no emissions at this location

**KEY TO MATRIX**

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank -- The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF0003 – Facility Wide	VOC Loading – LAC 33:III Chapter 2107 – Covered facilities must be equipped with a vapor collection system.	EXEMPT – This loading operation does not service tanks, trucks, or trailers. Ships and barge loading operations are exempt.
	Marine Vapor Recovery – LAC 33:III Chapter 2108 – Facility shall be equipped with a Vapor Recovery/Destruction System that reduces recovered vapors by 90% by weight. Barges must be controlled to a level of 0.25 lbs emitted/1,000 gal loaded.	EXEMPT – Vapor Pressure is less than 1.5 psia.
	Pumps and Compressors – LAC 33:III.2111 – Rotary pumps and compressors handling VOCs with a vapor pressure of 1.5 psia or greater must be equipped with mechanical seals or other equivalent equipment as determined by the administrative authority.	EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.
	Emission Standards for Ethylene Dichloride Plants – 40 CFR 61.62 – The concentration of VCM in exhaust streams from equipment used in EDC purification shall not exceed 10 ppm.	NON-APPLICABLE – EDC Marine Loading Operations are non applicable per 40 CFR 61.60.
	MACT Maintenance Wastewater Requirements – 40 CFR 63.105(b) – Maximum Achievable Control Technology for Marine Tank Vessel Loading Operations. The owner and operator shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e. a maintenance turnaround) and during periods which are not shutdowns (i.e., routine maintenance).	EXEMPT– Per 63.560(d)(1) Subpart Y does not apply to emissions resulting from marine tank vessel loading operations of commodities with vapor pressure less than 1.5 psia. EDC vapor pressure is 1.2 psia. Therefore the operations are exempt from this regulation.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT0009 – 03-01 – Product Storage Tank	Standards of Performance for Volatile Organic Liquid Storage Vessels – 40 CFR 60, Subpart Kb - Tank reconstruction after July 23, 1984. Tank has a capacity greater than 40,000 gallons and an operating vapor pressure greater than 1.5 psia.  Compliance Assurance Monitoring – 40 CFR 64 – Compliance is required for facilities to provide reasonable assurance that compliance is maintained.	EXEMPT – Compliance with the provisions of 40 CFR Part 63, Subpart G shall be deemed to constitute compliance with 40 CFR 60, Subpart Kb.  EXEMPT – Units are exempt from the requirements of this Part if “emission limitations or standards are proposed by the EPA after November 15, 1990”. NESHAP MACT regulations were promulgated in April 22, 1996 (Subpart G). The Product Storage Tank is exempt from CAM.
FUG0001 – 03-02 – Fugitive Emissions	Fugitive Emission Control – LAC 33:III.2121 – Applicable to SOCFMI facilities. Process units subject to LAC 33:III.2122 are exempt from this section.  Fugitive Emission Control for Ozone Nonattainment Areas – LAC 33:III.2122 – State Only – Applicable to SOCFMI facilities. Applies to pumps, compressors, pressure relief devices, open ended valves or lines, process drains, valves agitators, and connectors that are intended to operate in VOC service 300 hours or more during the calendar year.  Emission Standard for Ethylene Dichloride Plants – NESHAP Subpart F, 40 CFR 61.65 – EDC plants shall implement a leak detection and repair program consistent with 40 CFR 61 Subpart V.	EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.  EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.  EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
FUG0001 – 03-02 – Fugitive Emissions (continued)	National Emission Standard for Equipment Leaks – NESHAP Subpart V, 40 CFR 61.240 – Applicable to equipment in VHAP service. WVC will meet the more stringent requirements of HON Subpart H, Standards for Equipment Leaks.	EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.
	Standards of Performance for Equipment Leaks for EDC Facilities – 40 CFR 61, NESHAP Subpart V – Applicable to EDC facilities. Applies to pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves connectors, surge control vessels, bottom receivers, instrumentation systems, and control devices that are intended to operate 300 hours or more.	EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.
	Standards of Performance for Equipment Leaks of VOC in SOCM I Facilities – 40 CFR 61, NSPS Subpart VV – Applicable to SOCM I facilities. Applies to pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves connectors, surge control vessels, bottom receivers, instrumentation systems, and control devices that are intended to operate 300 hours or more.	EXEMPT – WVC will comply with the Louisiana Fugitive Emission Program Consolidation Guidelines. The overall most stringent program is HON.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

## 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

## 40 CFR PART 70 GENERAL CONDITIONS

- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
  2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit. [Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement. [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

## 40 CFR PART 70 GENERAL CONDITIONS

- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
  4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
  5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]

## 40 CFR PART 70 GENERAL CONDITIONS

- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

**40 CFR PART 70 GENERAL CONDITIONS**

- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
  
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
  
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated December 19, 2007, along with supplemental information dated May 19, 2008.
  
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
  
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
  
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    1. Report by June 30 to cover January through March
    2. Report by September 30 to cover April through June
    3. Report by December 31 to cover July through September
    4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
  2. Cause of noncompliance;
  3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 1138 - Westlake Vinyls Co LP  
 Activity Number: PER20080001  
 Permit Number: 2843-V1  
 Air - Title V Regular Permit Renewal

Subject Item	VOC	
	Avg lb/hr	Tons/Year
Marine Loading Operations		
FUG 0001 03-02	0.02	0.10

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 1138 - Westlake Vinyls Co LP

Activity Number: PER20080001

Permit Number: 2843-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Tons/Year
FUG 0001 03-02	1,2-Dichloroethane	0.02	0.10
UNF 0003 Entire Facility	1,2-Dichloroethane		0.10

**Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.**

**General Information**

**AJ ID: 1138 Westlake Vinyis Co LP**  
**Activity Number: PER20080001**  
**Permit Number: 2843-V1**  
**Air - Title V Regular Permit Renewal**

**Also Known As:**

ID	Name	User Group	Start Date
0180-00008	Westlake Vinyis Co LP	CDS Number	11-16-1999
51-0370356	Federal Tax ID	Federal Tax ID	11-21-1999
LAD003913449	Westlake Vinyis Co LP	Hazardous Waste Notification	10-07-2005
PMT/CA	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
LAD003913449	Borden	Inactive & Abandoned Sites	11-01-1979
LA0000281	LPDES #	LPDES Permit #	05-22-2003
LAR10B028	LPDES #	LPDES Permit #	05-22-2003
WP0912	LWDPS #	LWDPS Permit #	06-25-2003
04105	LELAP #	Laboratory Services Division	02-23-2004
2019	Permit #	Multimedia	08-25-1999
GL-558	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
G-005-11003	Radiation General License	Radiation License Number	04-18-2006
GD-005-1652	Site ID #	Solid Waste Facility No.	11-30-1999
16892	Site ID #	Solid Waste Facility No.	07-24-2001
38776	Borden Chemical	TEMPO Merge	10-31-2000
45778	Borden Chemicals & Plastics	TEMPO Merge	10-31-2000
48995	Borden Chemical Division of Borden Inc	TEMPO Merge	10-31-2000
83338	Borden Chemicals & Plastics	TEMPO Merge	07-10-2001
84810	Borden Chemical Inc - Geismar Plant	TEMPO Merge	10-31-2000
90754	Borden Chemical Inc - Formaldehyde Plant	TEMPO Merge	08-01-2001
707348RDNCLOUIS	Borden Chemical Inc - Formaldehyde Plant	TEMPO Merge	07-13-2004
1243	TRI #	Toxic Release Inventory	11-21-1999
878	UST Case History Case Number	UST Case Number	11-21-1999
879	UST Case History Case Number	UST Case Number	11-21-1999
03000824	UST Case History Case Number	UST Case Number	11-21-1999
	UST Facility ID (from UST legacy data)	UST FID #	10-11-2002

**Physical Location:**

36045 Hwy 30  
 Geismar, LA 70734

Main FAX: 2256730444  
 Main Phone: 2256730547

**Mailing Address:**

PO Box 228  
 Geismar, LA 707340228

**Location of Front Gate:**

30° 20' 45" 71 hundredths latitude, 91° 15' 28" 1 hundredths longitude, Coordinate Method: GPS-Unspecified, Coordinate Datum: NAD83

**Related People:**

Name	Mailing Address	Phone (Type)	Relationship

**General Information**

AI ID: 1138 Westlake Vinyls Co LP  
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**Related People:**

Name	Mailing Address	Phone (Type)	Relationship
John Casey	PO Box 228 Geismar, LA 707340228	jcasey@westlake.co	Responsible Official for
John Casey	PO Box 228 Geismar, LA 707340228	2256736121 (WP)	Responsible Official for
John Casey	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Responsible Official for
John Casey	PO Box 228 Geismar, LA 707340228	jcasey@westlake.co	Accident Prevention Contact for
John Casey	PO Box 228 Geismar, LA 707340228	2256736121 (WP)	Solid Waste Billing Party for
John Casey	PO Box 228 Geismar, LA 707340228	jcasey@westlake.co	Water Billing Party for
John Casey	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Water Billing Party for
John Casey	PO Box 228 Geismar, LA 707340228	2256736121 (WP)	Water Billing Party for
John Casey	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Solid Waste Billing Party for
John Casey	PO Box 228 Geismar, LA 707340228	jcasey@westlake.co	Solid Waste Billing Party for
John Casey	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Accident Prevention Contact for
John Casey	PO Box 228 Geismar, LA 707340228	2256736121 (WP)	Accident Prevention Contact for
John Casey	PO Box 228 Geismar, LA 707340228	KKHONSARI@WES	Radiation Contact For
Karen Khonsari	PO Box 228 Geismar, LA 707340228	KKHONSARI@WES	Emission Inventory Contact for
Karen Khonsari	PO Box 228 Geismar, LA 707340228	2256730647 (WP)	Emission Inventory Contact for
Karen Khonsari	PO Box 228 Geismar, LA 707340228	2256730647 (WP)	Radiation Contact For
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730607 (WP)	Water Permit Contact For
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Haz. Waste Billing Party for
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Accident Prevention Billing Party for
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730607 (WP)	Accident Prevention Billing Party for
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730607 (WP)	Haz. Waste Billing Party for
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730607 (WP)	Accident Prevention Contact for
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Accident Prevention Contact for
Blake Mora	PO Box 228 Geismar, LA 707340228	2256730444 (WF)	Water Permit Contact For

**Related Organizations:**

Name	Address	Phone (Type)	Relationship
Westlake Vinyls Co LP	PO Box 228 Geismar, LA 70734		Agent of Service for
Westlake Vinyls Co LP	PO Box 228 Geismar, LA 70734		Radiation License Billing Party for
Westlake Vinyls Co LP	PO Box 228 Geismar, LA 70734		Air Billing Party for
Westlake Vinyls Co LP	PO Box 228 Geismar, LA 70734		Owns
Westlake Vinyls Co LP	PO Box 228 Geismar, LA 70734		Emission Inventory Billing Party

**NAIC Codes:**

32518, Other Basic Inorganic Chemical Manufacturing

General Information

AI ID: 1138 Westlake Vinyls Co LP  
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Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to [facupdate@la.gov](mailto:facupdate@la.gov).

**INVENTORIES**

AI ID: 1138 - Westlake Vinyls Co LP  
 Activity Number: PER20080001  
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 Air - Title V Regular Permit Renewal

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Marine Loading Operations</b>						
EQ70009	03-01 - Product Storage Tank	3.2 million gallons	350 gallons/min	350 gallons/min		8760 hr/yr (All Year)
FUG0001	03-02 - Fugitive Emissions					8760 hr/yr (All Year)

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
<b>Marine Loading Operations</b>							
EQ70009	03-01 - Product Storage Tank					46	

**Relationships:**

**Subject Item Groups:**

ID	Group Type	Group Description
UNF0003	Unit or Facility Wide	Entire Facility - Marine Loading Operations

**Group Membership:**

**NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group**

**Annual Maintenance Fee:**

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0620	Halogenated Hydrocarbons (Rated Capacity)	800	MM Lb/Yr

**SIC Codes:**

2812	Alkalies and chlorine	A1138
2869	Industrial organic chemicals, nec	A1138

**SPECIFIC REQUIREMENTS**

AI ID: 1138 - Westlake Vinyls Co LP  
 Activity Number: PER20080001  
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**EQ10009 03-01-EDC Product Storage Tank**

- 1 [40 CFR 63.119(a)(1)] Operate and maintain a closed-vent system and control device meeting the requirements specified in 40 CFR 63.119(e), route the emissions to a process or a fuel gas system as specified in 40 CFR 63.119(f), vapor balance as specified in 40 CFR 63.119(g), or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
- 2 [40 CFR 63.122(a)(1)] Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
- 3 [40 CFR 63.122(a)(3)] Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- 4 [40 CFR 63.123] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.  
 Equip with a submerged fill pipe.  
 VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.  
 Which Months: All Year Statistical Basis: None specified
- 5 [LAC 33:III.2103.B]
- 6 [LAC 33:III.2103.E.1] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 7 [LAC 33:III.2103.H.3]
- 8 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 9 [LAC 33:III.5109.A.1] Compliance with NESHAP 40 CFR 63 Subpart G has been determined to be compliance with MACT in accordance with LAC 33:III.5109.A.2.

**FUG0001 03-02-Fugitive Emissions**

- 10 [40 CFR 63.162(c)] Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. Subpart H. [40 CFR 63.162(c)]
- 11 [40 CFR 63.162(f)] Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification on a valve may be removed after it has been monitored as specified in 40 CFR connectors subject to 40 CFR 63.174(e)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(i)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]
- 12 [40 CFR 63.163(b)(1)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (j). If a reading of 10,000 ppm (phase I); 5,000 ppm (phase II); or 5,000 ppm (phase III, pumps handling polymerizing monomers), 2,000 ppm (phase III, pumps in food/medical service), or 1,000 ppm (phase III, all other pumps) or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]  
 Which Months: All Year Statistical Basis: None specified
- 13 [40 CFR 63.163(b)(3)] Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]  
 Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

AI ID: 1138 - Westlake Vinyls Co LP  
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**FUG0001 03-02-Fugitive Emissions**

- 14 [40 CFR 63.163(c)] Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- 15 [40 CFR 63.163(d)(2)] Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- 16 [40 CFR 63.163(d)(4)] Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]
- 17 [40 CFR 63.163(e)(1)] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(1)]
- 18 [40 CFR 63.163(e)(2)] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(2)]
- 19 [40 CFR 63.163(e)(3)] Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(3)]
- 20 [40 CFR 63.163(e)(4)] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(4)]
- 21 [40 CFR 63.163(e)(6)(i)] Which Months: All Year Statistical Basis: None specified  
 Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)(i)]
- 22 [40 CFR 63.163(e)(6)] Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)]
- 23 [40 CFR 63.163(e)] Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)]  
 Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

**AJID: 1138 - Westlake Vinyls Co LP**  
**Activity Number: PER20080001**  
**Permit Number: 2843-V1**  
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- 24 [40 CFR 63.163(h)] Pumps in light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each pump as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirement of 40 CFR 63.163(b)(3) and (e)(4), and the daily requirements of 40 CFR 63.163(e)(5). Subpart H. [40 CFR 63.163(h)]  
 Which Months: All Year Statistical Basis: None specified
- 25 [40 CFR 63.163(j)(1)] Pumps in light liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(1)]
- 26 [40 CFR 63.163(j)(2)] Pumps in light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(2)]  
 Which Months: All Year Statistical Basis: None specified
- 27 [40 CFR 63.165(b)(1)] Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- 28 [40 CFR 63.165(b)(2)] Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]  
 Which Months: All Year Statistical Basis: None specified
- 29 [40 CFR 63.165(d)(2)] Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.165(a) and (b). Subpart H. [40 CFR 63.165(d)(2)]
- 30 [40 CFR 63.166] Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- 31 [40 CFR 63.167] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.
- 32 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]  
 Which Months: All Year Statistical Basis: None specified
- 33 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]  
 Which Months: All Year Statistical Basis: None specified

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- 34 [40 CFR 63.168(d)(1)] Valves in gas/vapor service or light liquid service (Phase II, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]  
Which Months: All Year Statistical Basis: None specified
- 35 [40 CFR 63.168(d)(2)] Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). Subpart H. [40 CFR 63.168(d)(2)]  
Which Months: All Year Statistical Basis: None specified
- 36 [40 CFR 63.168(e)(1)] Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]
- 37 [40 CFR 63.168(f)(3)] Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(f)(3)]  
Which Months: All Year Statistical Basis: None specified
- 38 [40 CFR 63.168(f)] Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(f)]
- 39 [40 CFR 63.168(h)(1)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(1)]
- 40 [40 CFR 63.168(h)(2)] Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(2)]  
Which Months: All Year Statistical Basis: None specified
- 41 [40 CFR 63.168(i)(1)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(1)]
- 42 [40 CFR 63.168(i)(3)] Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(3)]  
Which Months: All Year Statistical Basis: None specified

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- 43 [40 CFR 63.169(a)] Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/medical service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
- 44 [40 CFR 63.169(c)] Which Months: All Year Statistical Basis: None specified  
Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]
- 45 [40 CFR 63.172(f)(1)(i)] Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
- 46 [40 CFR 63.172(f)(1)(ii)] Which Months: All Year Statistical Basis: None specified  
Closed-vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(ii)]
- 47 [40 CFR 63.172(f)(2)(i)] Which Months: All Year Statistical Basis: None specified  
Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
- 48 [40 CFR 63.172(f)(2)(ii)] Which Months: All Year Statistical Basis: None specified  
Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
- 49 [40 CFR 63.172(h)] Which Months: All Year Statistical Basis: None specified  
Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(i). Subpart H. [40 CFR 63.172(h)]
- 50 [40 CFR 63.172(k)(1)] Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(f)(1) or (f)(2). Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(1)]
- 51 [40 CFR 63.172(k)(2)] Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(2)]
- 52 [40 CFR 63.172(l)(1)] Which Months: All Year Statistical Basis: None specified  
Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(1)]

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- 53 [40 CFR 63.172(f)(2)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(i)(2)]  
 Which Months: All Year Statistical Basis: None specified
- 54 [40 CFR 63.172(m)] Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- 55 [40 CFR 63.174(b)(3)(i)] Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(i)]  
 Which Months: All Year Statistical Basis: None specified
- 56 [40 CFR 63.174(b)(3)(ii)] Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]  
 Which Months: All Year Statistical Basis: None specified
- 57 [40 CFR 63.174(c)(1)(i)] Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]  
 Which Months: All Year Statistical Basis: None specified
- 58 [40 CFR 63.174(d)] Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
- 59 [40 CFR 63.174(f)(1)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (c). Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(1)]
- 60 [40 CFR 63.174(f)(2)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(2)]  
 Which Months: All Year Statistical Basis: None specified
- 61 [40 CFR 63.174(g)] Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Comply with this requirement instead of the requirements in 40 CFR 63.174(a), (d), and (e). Subpart H. [40 CFR 63.174(g)]
- 62 [40 CFR 63.174(h)(2)] Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Comply with this requirement instead of the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. Subpart H. [40 CFR 63.174(h)(2)]
- 63 [40 CFR 63.174(i)] Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]

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- 64 [40 CFR 63.180] Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.
- 65 [40 CFR 63.181] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181(a) through (k). Subpart H.
- 66 [40 CFR 63.182(b)] Submit Initial Notification: Due within 120 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(b)(1). Subpart H. [40 CFR 63.182(b)]
- 67 [40 CFR 63.182(c)] Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]
- 68 [40 CFR 63.182(d)] Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)]

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- 69 [40 CFR 63.102(a)] Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
- 70 [40 CFR 63.103(b)(1)] Conduct performance tests and compliance determinations according to the schedule and procedures in 40 CFR 63.7(a) and the applicable sections of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(b)(1)]
- 71 [40 CFR 63.103(b)(2)] Submit Notification: Due at least 30 calendar days before a performance test is scheduled. Notify DEQ of the intention to conduct a performance test to allow DEQ the opportunity to have an observer present during the test. Subpart F. [40 CFR 63.103(b)(2)]
- 72 [40 CFR 63.103(b)(3)] Conduct performance tests according to the provisions in 40 CFR 63.7(e) of subpart A, except conduct performance tests at maximum representative operating conditions for the process. Subpart F. [40 CFR 63.103(b)(3)]
- 73 [40 CFR 63.103(c)(1)] Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
- 74 [40 CFR 63.103(c)(2)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Maintain records specified in 40 CFR 63.103(c)(2)(i) through (iii), as well as records specified in 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.103(c)(2)]
- 75 [40 CFR 63.103(c)] Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]
- 76 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.
- 77 [40 CFR 68.12(b)(2)] Complete the five-year accident history for the process as provided in 68.42. [40 CFR 68.12(b)(2)]
- 78 [40 CFR 68.12(b)(3)] Ensure that response actions have been coordinated with local emergency planning and response agencies. [40 CFR 68.12(b)(3)]
- 79 [40 CFR 68.12(b)(4)] Include in the RMP the certification specified in 68.12(b)(4). [40 CFR 68.12(b)(4)]
- 80 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 81 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
- 82 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (1.3).

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- 83 [40 CFR 68.165] Submit in the RMP information one worst-case release scenario for each Program 1 process. Include the data specified in 68.165(b)(1) through (1.3).
- 84 [40 CFR 68.168] Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).
- 85 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 86 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 87 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 88 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 89 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 90 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 91 [40 CFR 68.28] Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).
- 92 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 93 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 94 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 95 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 96 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
- 97 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
- 98 [40 CFR 70.5(a)(1)(iii)] Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 99 [40 CFR 70.6(a)(3)(iii)(A)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]

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- 100 [40 CFR 70.6(a)(3)(iii)(B)] Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]
- 101 [40 CFR 70.6(c)(5)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 102 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 103 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 104 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 105 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 106 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 107 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 108 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 109 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 110 [LAC 33:III.5107.A] Submit Annual Emissions Report (TEDD): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 111 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 112 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 113 [LAC 33:III.5113.A.2] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.

**SPECIFIC REQUIREMENTS**

AI ID: 1138 - Westlake Vinyls Co LP  
 Activity Number: PER20080001  
 Permit Number: 2843-V1  
 Air - Title V Regular Permit Renewal

**UNF0003 Marine Loading Operations**

- 114 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
- 115 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 116 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 117 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
- 118 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 119 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 120 [LAC 33:III.919.D] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment.
- 121 [LAC 33:III.927] Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.  
 Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:III. Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:III.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.